

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT

ALBIN MELI, CHARLIE MELI,
and JEREMIE MELI,

Plaintiffs,

v.

Civil Action No. 2:19-cv-71

CITY OF BURLINGTON, VERMONT,
BRANDON DEL POZO,
JASON BELLAVANCE, and
CORY CAMPBELL,

Defendants.

JOINT MOTION TO STAY DISCOVERY THIRTY (30) DAYS

NOW COME the parties, by and through their counsel of record, and hereby jointly move to stay discovery for 30 days. In support of their joint motion, the parties submit the following Memorandum of Law.

Memorandum of Law

Since the September 14, 2020 status conference, the parties through counsel have engaged in a series of discussions addressed, in part, to resolving the case. Towards that end, the parties have agreed to attend a second (virtual) mediation on Wednesday, October 21, 2020. As part of this effort, the parties seek permission from the Court to stay discovery for thirty (30) days. A short stay in discovery will help ensure that the parties' time and resources will be devoted to maximizing the chance of a successful mediation. In the event that the second mediation is unsuccessful, the parties will submit a revised Discovery Schedule/Order with the Court.

WHEREFORE, for the foregoing reasons, the parties' Joint Motion to Stay Discovery
Thirty (30) Days should be granted.

DATED at Brattleboro, Vermont, this 23rd day of September, 2020.

/s/ Evan B. Chadwick
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DATED at Burlington, Vermont this 23rd day of September, 2020.

/s/ Pietro J. Lynn
Pietro J. Lynn, Esq.
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SO ORDERED:

/s/ William K. Sessions III

Judge

September 30, 2020

Date